

VIA ECF

The Honorable Arun Subramanian
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

September 23, 2024

Re: *United States, et al. v. Live Nation Entertainment, Inc., et al.*, No. 1:24-cv-03973

Dear Judge Subramanian:

Plaintiffs and Defendants submit this joint letter pursuant to the Scheduling Order issued on August 20, 2024 (ECF No. 237).

I. Plaintiffs' Issues for Discussion at the Conference

1. Plaintiffs' September 17 Motion to Compel and Defendants' initial disclosures;
2. Interim and substantial completion deadlines for document productions;
3. Plaintiffs' First Requests for Production to Defendants ("Plaintiffs' First RFPs"):
 - i. Request No. 3 ("All documents responsive to any of the Investigative Subpoenas issued by any Plaintiff during the Investigation, and that were reviewed by counsel for the Company at any level (including any first-level or contract review) but have not yet been produced."), and
 - ii. Request No. 5 ("All executed contracts in effect on or after January 1, 2015, including original contracts and any subsequent modifications, extensions, amendments, and all underlying agreements that govern or governed the Company's agreement with any Person, for all: a. Relevant Products and Services; b. Secondary Ticketing Services; c. Venue Operations and Booking Services; or d. Artist Management Services.");
4. Defendants' responses to Plaintiffs' First Interrogatories; and
5. Documents reviewed for responsiveness to Plaintiffs' civil investigative demands ("CIDs").

II. Defendants' Issues for Discussion at the Conference

1. The scope of discovery relating to secondary ticketing;
2. The number of hours allotted for Plaintiffs' 30(b)(6) depositions;
3. Contention interrogatories; and
4. The scope of the Protective Order.

III. Plaintiffs' Statement

Plaintiffs have diligently and expeditiously pursued and produced discovery in accordance with the Court's schedule. The original Plaintiffs have substantially completed their productions in response to Defendants' First Requests for Production, substantively responded to all of Defendants' interrogatories, and provided detailed initial disclosures identifying 180 individuals and entities likely to have discoverable information. By contrast, Defendants have delayed the production of responsive documents, failed to identify non-parties they may rely on for their defenses, and have otherwise impeded Plaintiffs' pursuit of timely discovery. For example:

- ***Discovery Delays:*** Plaintiffs issued their first RFPs on July 15 seeking readily available documents. Nevertheless, Defendants waited more than 55 days to produce any documents, and before today, had only produced organization charts, despite Plaintiffs serving 13 RFPs in July and 74 in total. Defendants have also rejected Plaintiffs' requests for a weekly standing call to more efficiently address the parties' discovery obligations.

- **Request No. 3:** Defendants have refused to produce documents they determined were responsive to compulsory process issued during Plaintiffs' pre-complaint investigation but not produced before Plaintiffs filed the complaint. Defendants have *already* reviewed these documents and identified them as relevant to facts at issue in the litigation.
- **Request No. 5:** While the parties have made progress in their discussion of the production of relevant contracts, central to Plaintiffs' claims, some important issues remain in dispute. The parties have not been able to agree on the production of artist contracts for promotions services, as Defendants continue to raise confidentiality concerns despite the Protective Order in place.
- **Defendants' Responses to Plaintiffs' First Interrogatories:** Defendants' approach to Plaintiffs' interrogatories suggests a lack of inquiry inconsistent with their responsibilities under the Federal Rules. Defendants did not provide substantive responses to most of Plaintiffs' 10 interrogatories, quibbled with the meaning of terms frequently used and well known in the industry, such as "non-exclusive agreement," and even when they did provide a substantive response, failed to provide any new information. Until today, Defendants refused to provide a date certain by which they will supplement their inadequate responses.
- **Documents reviewed for responsiveness to Plaintiffs' CIDs:** Defendants seek to treat any documents they previously determined as not responsive to Plaintiffs' CIDs as irrelevant to Plaintiffs' RFPs. However, Plaintiffs' RFPs are actually *broad*er than the CIDs, such that Defendants' approach would exclude otherwise relevant materials.
- **Number of hours for Plaintiffs' 30(b)(6) depositions:** Plaintiffs request 35 hours to address the complex issues in this case, many of which are best addressed at the corporate level because a given individual will lack sufficient personal knowledge to testify on them competently.
- **Defendants' initial disclosures:** Defendants' initial disclosures fail to identify any specific non-party individuals Defendants may use to support their defenses.
- **Secondary Ticketing:** Defendants' request to "cabin" discovery regarding secondary ticketing is premature, as the parties have only just begun discussing the relevant RFPs.
- **Protective Order:** Defendants' vague and unsubstantiated claim that an entire category of sensitive information produced by non-parties should be designated "non-confidential" cannot be evaluated without more information and an opportunity for non-parties to comment.
- **Contention Interrogatories:** Defendants' request to serve contention interrogatories is premature and not justified given Plaintiffs' prompt and substantial discovery responses.

Defendants' discovery delays and inadequate responses risk impeding Plaintiffs' ability to conduct document discovery in time to identify deponents, allocate deposition hours, and complete depositions on schedule. Plaintiffs seek to discuss with the Court ways to ensure party discovery proceeds in a timely manner, including implementing interim and substantial completion deadlines for document productions going forward.

IV. Defendants' Statement

Plaintiffs ignore not only that Defendants have already produced *over 600,000* documents during their pre-Complaint investigations, but also that the parties have made significant progress in narrowing Plaintiffs' listed issues, some of which will be moot by the time of the September 27 conference. By contrast, Defendants' issues require the Court's guidance:

- **Discovery Regarding Secondary Ticketing:** After their multi-year investigation, which specifically included an investigation into secondary ticketing, Plaintiffs chose not to bring any claims regarding secondary ticketing in the face of evidence that Ticketmaster's share in secondary ticketing is too low to support a claim. But, Plaintiffs have served over 30 broad discovery requests regarding secondary ticketing. Defendants request that discovery into

secondary ticketing be prohibited without a clear showing that the facts, documents or data sought are directly relevant to the alleged anti-competitive effects in *primary* ticketing.

- **30(b)(6) Depositions:** Plaintiffs' request for 35 hours is burdensome and disproportionate, particularly since the parties are not equally situated. Plaintiffs do not explain why they need more than the 14 hours provided by the federal rules, let alone the 20 hours Defendants offered.
- **Interrogatories:** Plaintiffs have failed to sufficiently disclose the basis of their claims, including by serving broad initial disclosures identifying numerous third parties with no meaningful information about their relevance to Plaintiffs' broad allegations. This hide-the-ball approach impedes Defendants' ability to conduct discovery and is highly inefficient. Plaintiffs' interrogatory responses (responding to requests to identify third parties encompassed by specific allegations in the Amended Complaint) do not come close to curing the problem. Defendants therefore request that the Court allow them to serve contention interrogatories on Plaintiffs by the interrogatory deadline. Defendants do not otherwise have a comparable tool like 30(b)(6) depositions to obtain information about the basis of Plaintiffs' claims.
- **Protective Order:** The vast majority of the ~850,000 documents in Plaintiffs' investigative files are designated Highly Confidential or Confidential. Many do not meet the Protective Order's confidentiality requirements, but challenging improper designations on a by-document basis is burdensome. At this stage, the improper designations are particularly problematic with respect to the details in third-party materials relating to venues purportedly impacted by Defendants' alleged conduct. Defendants request that the Protective Order be amended to categorically designate such information non-confidential. Absent such relief, Defendants will be hampered from obtaining information from their relevant business people to put on a full defense.

Plaintiffs mischaracterize the state of discovery by raising non-issues and failing to account for Defendants' significant progress on discovery to date:

- **Status of Discovery:** Plaintiffs admit that the vast majority of their RFPs seek custodial documents, and Plaintiffs do not (and cannot) claim that Defendants have delayed in responding to those requests. Additionally, Defendants have already produced 19,713 pages of material in response to Plaintiffs' "go-get" requests, which the parties continue to negotiate.
- **Plaintiffs' Request Nos. 3 and 5:** With respect to Request No. 3, this is a non-issue because there are no documents that Defendants "determined were responsive" to Plaintiffs' CIDs but did not produce. With respect to Request No. 5, the parties are actively negotiating the scope of contracts to be produced, including artist contracts.
- **Defendants' Interrogatory Responses:** Defendants have fully complied with their obligations under the rules, and—after Plaintiffs clarified ambiguities in their requests during a recent meet and confer—Defendants intend to submit supplemental responses within the next week.
- **Review of Documents Not Responsive to CIDs:** Plaintiffs admit that there is significant overlap between the issues relevant to the investigation and this case. It would be wasteful and burdensome for Defendants to re-review documents (over 1.8 million) that they already determined are irrelevant to those overlapping issues. The parties continue to discuss this.
- **Defendants' Initial Disclosures:** Defendants disclosed the individuals and entities known to them at this time, including 15 individuals employed by Defendants and 14 individuals/entities outside of Defendants. When Defendants identify additional individuals/entities likely to have discoverable information that they may use to support their defenses, Defendants will make additional disclosures as required by Fed. R. Civ. P. 26(e).

Respectfully submitted,

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